

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                 |   |                       |
|---------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP., | ) |                       |
|                                 | ) |                       |
| Plaintiff,                      | ) |                       |
|                                 | ) |                       |
| v.                              | ) | Misc. No. 17-151-LPS  |
|                                 | ) |                       |
| BOLIVARIAN REPUBLIC OF          | ) | <b>PUBLIC VERSION</b> |
| VENEZUELA,                      | ) |                       |
|                                 | ) |                       |
| Defendant.                      | ) |                       |

**DECLARATION OF JARED R. FRIEDMANN  
IN SUPPORT OF THE SPECIAL MASTER'S RESPONSE  
TO OBJECTIONS TO THE FINAL RECOMMENDATION**

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Dated: August 7, 2025

*Counsel for Special Master Robert B. Pincus*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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CRYSTALLEX INTERNATIONAL CORP., )  
 )  
Plaintiff, )  
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v. ) Misc. No. 17-151-LPS  
 )  
BOLIVARIAN REPUBLIC OF VENEZUELA, ) **PUBLIC VERSION**  
 )  
Defendant. )  
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**DECLARATION OF JARED R. FRIEDMANN  
IN SUPPORT OF THE SPECIAL MASTER'S RESPONSE  
TO OBJECTIONS TO THE FINAL RECOMMENDATION**

I, Jared R. Friedmann, declare as follows:

1. I am a partner at the law firm Weil, Gotshal & Manges LLP ("**Weil**"), which is counsel to the Special Master in the above-captioned action.<sup>1</sup>
2. I submit this declaration ("**Declaration**") in connection with the *Special Master's Response to Objections to the Final Recommendation*.
3. The statements in this Declaration are, except where specifically noted, based on my personal knowledge.
4. Attached hereto as **Exhibit 1** to this Declaration is a true and correct copy of transcript excerpts of a hearing held before the Court on April 17, 2025.
5. Attached hereto as **Exhibit 2** to this Declaration is a true and correct copy of

<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the "**Sale Procedures Order**") or the Recommendation.

transcript excerpts for the deposition of Randall J. Weisenburger held July 24, 2025.

6. Attached hereto as **Exhibit 3** to this Declaration is a true and correct copy of email correspondence from Andrew Clarke on behalf of Weil to counsel to Red Tree Investments, LLC (“**Red Tree**”) dated May 16, 2025.

7. Attached hereto as **Exhibit 4** to this Declaration is a true and correct copy of Red Tree’s edits to the proposed Sale Order dated June 17, 2025 that was submitted as Exhibit 17 to the deposition of Xiao Song held on July 29, 2025.

8. Attached hereto as **Exhibit 5** to this Declaration is a true and correct copy of transcript excerpts for the deposition of Xiao Song held on July 29, 2025.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

New York, New York  
Dated August 7, 2025

/s/ Jared R. Friedmann

Jared R. Friedmann